

J. Andrew Coombs (CA SBN 123881)
andy@coombspc.com
Annie S. Wang (SBN 10792/CA SBN 243027)
annie@coombspc.com
J. Andrew Coombs, A Professional Corporation
517 East Wilson Avenue, Suite 202
Glendale, California 91206
Telephone: (818) 500-3200
Facsimile: (818) 500-3201

Designated Counsel:
Bryce K. Earl (SBN 7685)
bearl@nevadafirm.com
James D. Boyle (SBN 8384)
jboyle@nevadafirm.com
Kimberly J. Cooper (SBN 9533)
kcooper@nevadafirm.com
Santoro, Driggs, Walch, Kearney, Holley & Thompson
400 South Fourth Street, Third Floor
Las Vegas, Nevada 89101
Telephone: (702) 791-0308
Facsimile: (702) 791-1912

Attorneys for Plaintiff
Adobe Systems Incorporated

Lisa A. Rasmussen (SBN 207026)
lisa@lrasmussenlaw.com
Law Office of Lisa Rasmussen
616 South 8th Street
Las Vegas, Nevada 89101
Telephone: (702) 471-1436
Facsimile: (702) 471-6540

Attorney for Defendants

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

Adobe Systems Incorporated,)	Case No. 2:10-cv-00422-LRH-LRL
)	
Plaintiff,)	JOINT STIPULATION REGARDING
v.)	GOOGLE SUBPOENA PRODUCTION;
)	[PROPOSED] ORDER
Joshua Christenson, et al.,)	
)	
Defendants.)	

1 TO THE COURT:

2 Plaintiff Adobe Systems Incorporated (“Plaintiff” or “Adobe”) and Defendants Joshua
3 Christenson, an individual and d/b/a www.softwaresurplus.com, and Software Surplus Inc.
4 (collectively “Defendants”) hereby stipulate and agree as follows:

5 WHEREAS Plaintiff served a subpoena upon Google, Inc. (“Google”) on or about
6 September 2, 2010;

7 WHEREAS Defendants brought their “Emergency Motion to Quash Subpoena Issue to
8 Non-Party Custodian of Records Google, Inc.” on or about September 29, 2010;

9 WHEREAS the Parties stipulate and agree to resolve the dispute concerning the Google
10 subpoena as follows:

- 11 1. The Parties agree to have the responsive documents from Google be produced to
12 counsel for Defendants first for designations pursuant to the Protective Order entered in
13 this matter and for possible redactions within fourteen (14) calendar days upon receipt
14 by Defendants’ counsel of the documents from Google;
- 15 2. That any unredacted portions of the responsive documents be produced to Plaintiff’s
16 counsel within fourteen (14) calendar days upon receipt by Defendants’ counsel of the
17 documents from Google;
- 18 3. That if Defendants’ counsel proposes to make any redactions, she shall send a log of
19 any such proposed redactions with stated objections to Plaintiff’s counsel within
20 fourteen (14) calendar days; and

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27

1 4. That if any redactions are challenged by Plaintiff, Defendants will submit the
2 challenged redactions for *in camera* review before Magistrate Judge Foley.
3

4 IT IS SO STIPULATED.

5 DATED: February 4, 2011

J. Andrew Coombs, A Professional Corp.

7 By: /s/ Annie S. Wang
8 J. Andrew Coombs
9 Annie S. Wang
 Attorneys for Plaintiff Adobe Systems Incorporated

10 DATED: February 4, 2011

Law Office of Lisa Rasmussen

12 By: /s/ Lisa A. Rasmussen
13 Lisa A. Rasmussen
14 Attorney for Defendants Joshua Christenson, an
15 individual and d/b/a www.softwaresurplus.com, and
16 Software Surplus Inc.

17 IT IS SO ORDERED:

18 
19 UNITED STATES MAGISTRATE JUDGE

20 DATED: February 7, 2011

CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(b), I certify that on the 4th day of February, 2011, I caused the documents entitled JOINT STIPULATION REGARDING GOOGLE SUBPOENA PRODUCTION; [PROPOSED] ORDER to be served as follows:

Attorneys of Record	Party Represented	Method of Service
Lisa A. Rasmussen <i>lisa@lrasmussenlaw.com</i> Law Office of Lisa Rasmussen 616 South 8 th Street Las Vegas, Nevada 89101	Defendants, Counter Plaintiffs, and Third Party Plaintiffs Joshua Christenson, an individual and d/b/a <i>www.softwaresurplus.com</i> ; Software Surplus Inc.	<input type="checkbox"/> Personal Service <input checked="" type="checkbox"/> Email/E-File <input type="checkbox"/> Fax Service <input type="checkbox"/> Mail Service
Robert L. Langford, Esq. Robert L. Langford & Associates 616 South 8 th Street Las Vegas, NV 89101	Defendants, Counter Plaintiffs, and Third Party Plaintiffs Joshua Christenson, an individual and d/b/a <i>www.softwaresurplus.com</i> ; Software Surplus Inc.	<input type="checkbox"/> Personal Service <input type="checkbox"/> Email/E-File <input type="checkbox"/> Fax Service <input checked="" type="checkbox"/> Mail Service

DATED this 4th day of February, 2011.


 Katrina Bartolome